

Phillip G. Trad, Esq. (State Bar No. 80758)
LAW OFFICES OF PHILLIP G. TRAD
Post Office Box 19093
Irvine, California 92623-9093
Tel: 714-990-3541 Fax: 714-990-3545
Email: ptrad@roadrunner.com

Attorneys for Defendant, Randall Letcavage

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

PREMIER HOLDING CORPORATION, et.
al.,

Defendants.

CASE NO: 8:18-CV-00813-CJC-KESx

**EXHIBITS A, B & C TO DEFENDANT
RANDALL LETCAVAGE'S RESPONSE
TO PLAINTIFF'S MOTION TO COMPEL
PRODUCTION AND AN ACCOUNTING**

DECLARATION OF PHILLIP G. TRAD

Magistrate: Karen E Scott
Courtroom: 6D
Date: August 26, 2021
Time: 10:00 AM

Defendant, Randall Letcavage, severing himself from all other Defendants, respectfully submits the following Exhibits "A", "B" & "C" to his Response to Plaintiff's Motion To Compel and for an Accounting regarding Defendant's discovery responses to Plaintiff's Post Judgment Request for Production.

Respectfully submitted.

August 5, 2021

By: Phillip G. Trad
PHILLIP G. TRAD, ESQ.
Attorney for Randall Letcavage

**EXHIBITS TO DEFENDANT RANDALL LETCAVAGE'S RESPONSE TO PLAINTIFF'S MOTION TO
COMPEL**

Case No. 8:18-CV-00813-CJC-KESx

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is Post Office Box 19093, Irvine California 92623.

On August 5, 2021, I served true copies of the following document(s) described as **EXHIBITS A, B & C TO DEFENDANT RANDALL LETCAVAGE'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following ordinary business practices. I am readily familiar with the practice of Law Offices of Phillip G. Trad for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Anaheim, California.

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address ptrad@roadrunner.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 5, 2021, at Irvine, California.

By: /s/ Phillip G. Trad
Phillip G. Trad

EXHIBITS TO DEFENDANT RANDALL LETCAVAGE'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL

Case No. 8:18-CV-00813-CJC-KESx

**MASTER SERVICE LIST
SECURITIES AND EXCHANGE COMMISSION v. PREMIER HOLDING
CORPORATION, et al.
Case No. CV 18-00813-CJC(KESx)**

Bennett Ellenbogen (served by CM/ECF only)
Howard A Fischer (served by CM/ECF only) Neal Jacobson (served by CM/ECF only)
Alexander M Vasilescu (served by CM/ECF only)
 US Securities and Exchange Commission
 New York Regional Office 200 Vesey Street Suite 400
 New York, NY 10281 212-336-0062
 212-336-1322 (fax)

Amy J Longo (served by CM/ECF only)
US Securities and Exchange Commission
Los Angeles Regional Office
444 South Flower Street Suite 900
Los Angeles, CA 90071 323-965-3998
213-443-1904 (fax)
longoa@sec.gov

Attorneys for Plaintiff Securities and Exchange Commission

EXHIBITS TO DEFENDANT RANDALL LETCAVAGE'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL

Case No. 8:18-CV-00813-CJC-KESx

EXHIBIT "A"

ptrad@roadrunner.com

From: ptrad@roadrunner.com
Sent: Friday, July 2, 2021 8:09 PM
To: Bennett Ellenbogen
Cc: 'Tradlaw'
Subject: Randall Letcavage

Tracking:	Recipient	Read
	Bennett Ellenbogen	
	'Tradlaw'	
	Randall Letcavage HM	
	Randall Letcavage GM	
	'Robert Ouriel'	
	'Megan Bradshaw'	
	Ellenbogen, Bennett	Read: 7/3/2021 4:31 AM

Dear Mr. Ellenbogen,

I am writing further to you as we discussed in our call on Wednesday, June 30th and in response to your email of that date.

First, we had a spirited first call. I believe that we worked through each other's frustration and I wish to proceed on a go forward basis working professionally with you. I explained very clearly to you that I don't normally pick up someone else's case, but I have known Mr. Letcavage for many years and I believe I can be of assistance to my client in finding a resolution. I was very clear on this point.

Second, I have advised you that I am and will be undergoing a number of medical procedures over the next 5 to 6 months regarding an orthopedic issue. It is the reason some minor time has elapsed since my filing of my appearance and I expect that it will cause some interference of a minor (God willing) nature in the future. When I am down, it is generally felt it will be only for the procedure and a few days thereafter. I will be back in the saddle so to speak quickly assuming nothing goes wrong, which is not anticipated.

Mr. Ellenbogen, I have not in the 40 years of practice made a policy of disclosing my personal or medical issues. I am doing so here as a courtesy to you and I am hopeful that you will be sensitive to this issue and appreciate that I intend to always be open and candid about issues and status.

Third, your email is incorrect regarding some of our discussion. I have no intention of reviewing history with you or to keep beating a dead horse. However, I will clarify one point as it is central to our discussion of the 30th.

1. I specifically told you that it is my intention and that of Mr. Letcavage to provide all relevant discovery.
2. I told you that I would get back to you by today and I am doing that in writing as we both discussed.
3. I told you that I would have specifics as to what discovery is forth coming.

4. We got into a heated discussion that this was not an answer. Without arguing this further your specific answer about discovery will be provided below.
5. A motion is unnecessary in this case.

I hope that this clears this matter up so we can work cooperatively together.

Fourth, I have reviewed the post judgment discovery requests and responses. There were 18 propounded to Premier Holding and 24 propounded to Mr. Letcavage. I remind you that I only represent Mr. Letcavage and therefore any response from me is only as to him.

Fifth, I have had my client assemble the bank records for four banks over the relevant time that would be relevant to your requests. I have not counted yet but I believe that there are hundreds of pages or records. I note that a previous discussion about the execution of a confidentiality agreement apparently fell to the way side. I intend to have these records sent out by next Friday since I am having the first surgery on the 13th. You wanted to know when production would start, you now have a date specific and a list of applied records. I told you to allow me to work with you and we can get a lot accomplished. Absent some medical interference as discussed above of a minor nature, I intend to keep moving this matter moving forward.

Sixth, I will volunteer some additional information since the topics came up on our recent discussion, Mr. Letcavage has sparse assets, he rents a house and is trying to survive in business without the finances necessary and essential to assist him in that endeavor let alone to help him with his legal burdens. If he was so flush, he could hire the staff to expedite this issue where needed but he can't.

Finally, I would like to enter into some financial discussions once I get his current financial in presentation order. He does not have nor will likely have anything close to the judgement, but I would be willing to come to some realistic and reasonable amount that assist him and the SEC. That ball is in your court when you are ready.

Have a great 4th. Call with questions.

Phillip Trad

Phillip G. Trad, Esq.
Direct: 714-990-3541
Mobile: 949-632-4676
Facsimile: 714-990-3545
Email: ptrad@roadrunner.com

Law Offices of Phillip G. Trad
Post Office Box 19093
Irvine, California 92623-9093

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IRS Circular 230 Disclosure: In order to comply with requirements imposed by the Internal Revenue Service, you are informed that any U.S. Tax advice contained in this communication (including any

attachments) is not intended to be used and cannot be used for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promotion, marketing or recommending to another party any transaction or matter addressed herein.

EXHIBIT “B”

1 PHILLIP G. TRAD, ESQ. (State Bar No. 80758)
2 LAW OFFICES OF PHILLIP G. TRAD
3 Post Office Box 19093-9093
4 Irvine, California 92623
5 [714] 990-3541 Office Number
6 [714] 990-3545 Facsimile Number
7 Attorney for Defendant
8 Randall Letcavage

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 v.

15 PREMIER HOLDING
16 CORPORATION, et al.,

17 Defendant.

Case No. 8:18-CV-00813-CJC-KESx

**DEFENDANT RANDALL
LETCAVAGE'S RESPONSES TO
PLAINTIFF'S S' POST-JUDGMENT
DOCUMENT REQUEST-
SUPPLEMENT 1**

Judge: Hon. Cormac J. Carney
Courtroom: 9B

20
21
22 Defendant, Randall Letcavage, identifies the following requests and
23 responses to Plaintiff's request for production, which may be amended or
24 supplemented. Counsel agrees to meet and confer offline to determine a reasonable
25 schedule which will allow Defendant Randall Letcavage can continue his good faith
26 attempt to produce documents.

1 **REQUEST NO. 2:**

2 Documents sufficient to show all accounts You hold, held or beneficially
3 own(ed), directly or indirectly, at foreign and domestic financial institutions
4 including but not limited to banks and brokerage accounts and statements for each
5 of these accounts for the Relevant Period.

6 **RESPONSE TO REQUEST NO. 2:**

7 Defendant, Randall Letcavage has enclosed certain documents responsive to
8 this request. Certain confidential third-party information has been redacted.
9 Although Defendant's resources and personnel necessary to compile the documents
10 responsive to this request remain limited, Defendant will continue to conduct a
11 reasonable, good faith, and duly diligent search for additional documents
12 responsive this request, if any, and to the extent any such documents exist, are non-
13 objectionable and/or non-privileged, Defendant will provide such documents.

14 **REQUEST NO. 3:**

15 Documents sufficient to show account statements for each account identified
16 at request (2).

17 **RESPONSE TO REQUEST NO. 3:**

18 Defendant, Randall Letcavage has enclosed certain documents
19 responsive to this request. Certain confidential third-party information has been
20 redacted. Although Defendant's resources and personnel necessary to compile the
21 documents responsive to this request remain limited, Defendant will continue to
22 conduct a reasonable, good faith, and duly diligent search for additional documents
23 responsive this request, if any, and to the extent any such documents exist, are non-
24 objectionable and/or non-privileged, Defendant will provide such documents.

25 **REQUEST NO. 4:**

26 Documents sufficient to show all financial accounts over which you have
27 signatory authority.
28

RESPONSE TO REQUEST NO. 4:

Defendant, Randall Letcavage has enclosed certain documents responsive to this request. Certain confidential third-party information has been redacted. Although Defendant's resources and personnel necessary to compile the documents responsive to this request remain limited, Defendant will continue to conduct a reasonable, good faith, and duly diligent search for additional documents responsive this request, if any, and to the extent any such documents exist, are non-objectionable and/or non-privileged, Defendant will provide such documents.

Dated: July 16, 2021.

By: /s/ Phillip G. Trad

Phillip G. Trad
Attorney for Defendant
Randall Letcavage

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is

On July 16, 2021, I served true copies of the following document(s) described as **DEFENDANT RANDALL LETCAVAGE'S RESPONSES TO PLAINTIFF'S POST-JUDGMENT DOCUMENT REQUEST** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Law Offices of Lahdan S. Rahmati for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

BY E-MAIL: I caused a copy of the document(s) to be sent from e-mail address megan.samson@gmail.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 16, 2021, at Irvine, California.

By: /s/ Phillip G. Trad (MB)
Phillip G. Trad

**MASTER SERVICE LIST
SECURITIES AND EXCHANGE COMMISSION v. PREMIER HOLDING
CORPORATION, et al.
Case No. CV 18-00813-CJC(KESx)**

Bennett Ellenbogen (served by CM/ECF only)
Howard A Fischer (served by CM/ECF only)
Neal Jacobson (served by CM/ECF only)
Alexander M Vasilescu (served by CM/ECF only)
US Securities and Exchange Commission
New York Regional Office
200 Vesey Street Suite 400
New York, NY 10281
212-336-0062
212-336-1322 (fax)

Amy J Longo (served by CM/ECF only)
US Securities and Exchange Commission
Los Angeles Regional Office
444 South Flower Street Suite 900
Los Angeles, CA 90071
323-965-3998
213-443-1904 (fax)
longoa@sec.gov

*Attorneys for Plaintiff Securities
and Exchange Commission*

EXHIBIT "C"

Phillip G. Trad, Esq. (State Bar No. 80758)
LAW OFFICES OF PHILLIP G. TRAD
Post Office Box 19093
Irvine, California 92623-9093
Tel: 714-990-3541 Fax: 714-990-3545
Email: ptrad@roadrunner.com

Attorneys for Defendant, Randall Letcavage

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

PREMIER HOLDING CORPORATION, et.
al.,

Defendants.

CASE NO: 8:18-CV-00813-CJC-KESx

DEFENDANT RANDALL LETCAVAGE
SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S POST-JUDGEMENT
DOCUMENT REQUEST

Judge: Hon. Cormac J. Carney
Courtroom: 9B

Defendant, Randall Letcavage, severing himself from all other Defendants, hereby responds, objects and/or alleges in response to the following requests and provides the following supplemental responses to Plaintiff's request for production.

REQUEST NO. 1:

All Federal, State, and foreign tax returns filed by or on behalf of You for the Relevant Period.

RESPONSE TO REQUEST NO. 1:

Mr. Letcavage objects to Request No. 1 as unduly burdensome based upon the following grounds:

1. The Request seeks documents that are privileged and not subject to production.
2. This Request potentially seeks voluminous records over more than a nine (9)

DEFENDANT RANDALL LETCAVAGE'S RESPONSES TO PLAINTIFF'S POST-JUDGMENT DOCUMENT
REQUEST - Case No. 8:18-CV-00813-CJC-KESx

1 year period without any specificity as to which pages in these returns are
2 required.

3 3. Mr. Letcavage's lacks sufficient financial resources and personnel restricts his
4 ability to complete a search for these documents and compile them. Moreover,
5 documents are beyond the statutory holding period for tax records.

6 4. Further, Mr. Letcavage's has been advised that counsel has met and conferred
7 with Plaintiff's counsel in an attempt to limit the unduly burdensome nature of
8 this Request, but was unsuccessful.

9 5. Mr. Letcavage objects to the over broad scope of this Request. Plaintiff seeks
10 documents spanning a period of nine (9) years. Mr. Letcavage's position is that
11 the Relevant Period should be limited to January 1, 2017 to the Present.

12 6. Mr. Letcavage objects to this Request as seeking confidential third-party
13 information and Mr. Letcavage does not have authorization to disclose such
14 records that could result in exposure to liability brought by third parties for any
15 such unauthorized disclosure.

16 7. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
17 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
18 California State Constitution, and the Right to Privacy Act of 1978.

19 Without waiving these and all prior objections, no documents will be provided pursuant
20 to this request.

21 **REQUEST NO. 2:**

22 Documents sufficient to show all accounts You hold, held or beneficially
23 own(ed), directly or indirectly, at foreign and domestic financial institutions
24 including but not limited to banks and brokerage accounts and statements for each
25 of these accounts for the Relevant Period.

RESPONSE TO REQUEST NO. 2:

Mr. Letcavage objects to Request No. 2 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.
2. Mr. Letcavage's lacks sufficient financial resources and personnel restricts his ability to complete a search for these documents and compile them.
3. Further, Mr. Letcavage's has been advised that counsel has met and conferred with Plaintiff's counsel in an attempt to limit the unduly burdensome nature of this Request, but was unsuccessful.
4. Mr. Letcavage objects to this Request as seeking confidential third-party information and Mr. Letcavage does not have authorization to disclose such records that could result in exposure to liability brought by third parties for any such unauthorized disclosure.
5. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978. Moreover, Mr. Letcavage is advised by prior counsel that during a call with SEC Counsel on March 9, 2021, Mr. Letcavage's counsel was told that the redaction of confidential third-party financial information could be addressed with a confidentiality agreement, however, no confidentiality agreement was provided.

Without waiving these and all prior objections, Mr. Letcavage will provide payroll records, if any, that relate to Mr. Letcavage. Request has been made for these records and will be produced without further request, demand or subpoena.

REQUEST NO. 3:

Documents sufficient to show account statements for each account identified at request (2).

RESPONSE TO REQUEST NO. 3:

Without waiving these and all prior objections, Mr. Letcavage has already provided bank documents that respond to this request on July 16, 2021.

REQUEST NO. 4:

Documents sufficient to show all financial accounts over which you have signatory authority.

RESPONSE TO REQUEST NO. 4:

Mr. Letcavage objects to Request No. 4 as unduly burdensome based upon the following grounds:

1. This Request duplicates Requests 2 and 3, above, which potentially seeks voluminous records over more than a nine (9) year period.
2. Mr. Letcavage's lacks sufficient financial resources and personnel restricts his ability to complete a search for these documents and compile them.
3. Further, Mr. Letcavage's has been advised that counsel has met and conferred with Plaintiff's counsel in an attempt to limit the unduly burdensome nature of this Request, but was unsuccessful.
4. Mr. Letcavage objects to this Request as seeking confidential third-party information and Mr. Letcavage does not have authorization to disclose such records that could result in exposure to liability brought by third parties for any such unauthorized disclosure.
5. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978. Moreover, Mr. Letcavage is advised by prior counsel that during a call with SEC Counsel on March 9, 2021, Mr. Letcavage's counsel was told that the redaction of confidential third-party financial information could be addressed with a confidentiality agreement, however, no confidentiality agreement was provided.

1 Without waiving these and all prior objections, Mr. Letcavage has already provided bank
2 documents that respond to this request on July 16, 2021. However, should any additional
3 documents be discovered through continued search and diligence, these will be produced
4 without further request, demand or subpoena.

5 **REQUEST NO. 5:**

6 Documents sufficient to show all income received during the Relevant Period, directly
7 or indirectly, including the amount and source of funds.

8 **RESPONSE TO REQUEST NO. 5:**

9 Mr. Letcavage objects to Request No. 5 as unduly burdensome based upon the
10 following grounds:

- 11 1. This Request potentially seeks voluminous records over more than a nine (9)
12 year period.
- 13 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
14 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
15 California State Constitution, and the Right to Privacy Act of 1978.

16 Without waiving these and all prior objections, Mr. Letcavage will provided income
17 records that respond to this request. Request has been made and the records will be produce
18 upon receipt without further request, demand or subpoena.

19 **REQUEST NO. 6:**

20 Documents sufficient to show how You receive each income source, directly
21 or indirectly.

22 **RESPONSE TO REQUEST NO. 6:**

23 Mr. Letcavage objects to Request No. 6 as unduly burdensome based upon the
24 following grounds:

- 25 1. This Request potentially seeks voluminous records over more than a nine (9)
26 year period.
- 27 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records

sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

Without waiving these and all prior objections, Mr. Letcavage will provided income related income agreements that respond to this request. Request has been made and the records will be produce upon receipt without further request, demand or subpoena.

REQUEST NO. 7:

Documents sufficient to show all persons and entities that receive income on your behalf.

RESPONSE TO REQUEST NO. 7:

Mr. Letcavage objects to Request No. 7 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.
2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

Without waiving these and all prior objections, after a diligent search of potential sources of records, no such records exist to respond to this Request. No documents will be provided.

REQUEST NO. 8:

Documents sufficient to show Your business affiliation(s) with any entity during the Relevant Period.

RESPONSE TO REQUEST NO. 8:

Mr. Letcavage objects to Request No. 8 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.

2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

3. This Request is vague and ambiguous and requires Mr. Letcavage to speculate on what affiliations or entities Plaintiff is referring to.

Without waiving these and all prior objections, after a diligent search of potential sources of records, no such records exist to respond to this Request. No documents will be provided.

REQUEST NO. 9:

Documents sufficient to show any equity you hold in any entity.

RESPONSE TO REQUEST NO. 9:

Mr. Letcavage objects to Request No. 9 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.
2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

Without waiving these and all prior objections, Mr. Letcavage will provided documents in the form of Share Certificates that respond to this request. Request has been made and the records will be produce upon receipt without further request, demand or subpoena.

REQUEST NO. 10:

For any business with which You are affiliated, documents sufficient to show your affiliation, projected revenue, financial statements and projections of anticipated income to you.

RESPONSE TO REQUEST NO. 10:

Mr. Letcavage objects to Request No. 10 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.
2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

Without waiving these and all prior objections, after a diligent search of potential sources of records, no such records exist to respond to this Request. No documents will be provided.

REQUEST NO. 11:

For any business You acquired in the last 3 years, documents sufficient to show the name of the business and the purchase price paid or contributed by You.

RESPONSE TO REQUEST NO. 11:

Mr. Letcavage objects to Request No. 11 as unduly burdensome based upon the following grounds:

1. This Request potentially seeks voluminous records over more than a nine (9) year period.
2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records sought are in violation of the Fourth Amendment of the U.S. Constitution, the California State Constitution, and the Right to Privacy Act of 1978.

Without waiving these and all prior objections, after a diligent search of potential sources of records, no such records exist to respond to this Request. No documents will be provided.

1 **REQUEST NO. 12:**

2 Documents sufficient to show every interest You hold in real property or
3 shares of a property, e.g. a cooperative, during the Relevant Period.

4 **RESPONSE TO REQUEST NO. 12:**

5 Mr. Letcavage objects to Request No. 12 as unduly burdensome based upon the
6 following grounds:

- 7 1. This Request potentially seeks voluminous records over more than a nine (9)
8 year period.
- 9 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
10 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
11 California State Constitution, and the Right to Privacy Act of 1978.

12 Without waiving these and all prior objections, after a diligent search of potential
13 sources of records, no such records exist to respond to this Request. No documents will be
14 provided.

15 **REQUEST NO. 13:**

16 Documents sufficient to show Your interest in any personal property You
17 hold valued at \$5,000 or more.

18 **RESPONSE TO REQUEST NO. 13:**

19 Mr. Letcavage objects to Request No. 13 as unduly burdensome based upon the
20 following grounds:

- 21 1. This Request potentially seeks voluminous records over more than a nine (9)
22 year period.
- 23 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
24 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
25 California State Constitution, and the Right to Privacy Act of 1978.

26 Without waiving these and all prior objections, after a diligent search of potential
27 sources of records, no such records regarding personal property that exist to respond to

1 this Request. No documents will be provided.

2 **REQUEST NO. 14:**

3 Documents sufficient to show every equity stake you hold in an entity.

4 **RESPONSE TO REQUEST NO. 14:**

5 Mr. Letcavage objects to Request No. 14 as unduly burdensome based upon the
6 following grounds:

- 7 1. This Request potentially seeks voluminous records over more than a nine (9)
8 year period.
- 9 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
10 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
11 California State Constitution, and the Right to Privacy Act of 1978.

12 Please refer to the Response to Request number 9 above. Without waiving these
13 and all prior objections, after a diligent search of potential sources of records, other than as
14 provided in Response to Request number 9 above, Mr. Letcavage is unaware of any
15 additional documents that exist to respond to this Request. No further documents will be
16 provided.

17 **REQUEST NO. 15:**

18 Documents sufficient to show any crypto currency You hold.

19 **RESPONSE TO REQUEST NO. 15:**

20 Mr. Letcavage has previously responded to this Request that he does not hold any
21 crypto currency and has not held any crypto currency during the Relevant Period. This
22 completes Mr. Letcavage's response to Request No. 15.

23 **REQUEST NO. 16:**

24 Documents sufficient to show every safety deposit box, or other safe - such
25 as a home safe(s) - You hold, directly or indirectly, and the contents therein.

1 **RESPONSE TO REQUEST NO. 16:**

2 Mr. Letcavage has previously responded to this Request that he does not have a
3 safety deposit box, or other safe, and has not had any safety deposit box, or other safe,
4 during the Relevant Period. This completes Mr. Letcavage's response to Request No. 16.

5 **REQUEST NO. 17:**

6 Documents sufficient to show the owner(s) of Your residence and any changes
7 thereto in the last 5 years.

8 **RESPONSE TO REQUEST NO. 17:**

9 Mr. Letcavage has previously responded to this Request that he does not own his
10 residence and has not owned a residence for the past 5 years. This completes Mr.
11 Letcavage's response to Request No. 17.

12 **REQUEST NO. 18:**

13 Documents sufficient to show every transfer of money or property You
14 made, directly or indirectly, in the amount of \$5,000 or more during the Relevant Period,
15 including every investment and loan made to a person or entity.

16 **RESPONSE TO REQUEST NO. 18:**

17 Mr. Letcavage objects to Request No. 18 as unduly burdensome based upon the
18 following grounds:

- 19 1. This Request potentially seeks voluminous records over more than a nine (9)
20 year period.
- 21 2. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
22 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
23 California State Constitution, and the Right to Privacy Act of 1978.

24 Without waiving these and all prior objections, after a diligent search of potential
25 sources of records, no such records exist to respond to this Request. No documents will be
26 provided.

27 **REQUEST NO. 19:**

1 All documents concerning any transfers of United States Dollars into any other
2 currency by You during the Relevant Period.

3 **RESPONSE TO REQUEST NO. 19:**

4 Mr. Letcavage has previously responded to this Request that he has not transferred
5 any United States Dollars into any other currency during the Relevant Period. This
6 completes Mr. Letcavage's response to Request No. 19.

7 **REQUEST NO. 20:**

8 All documents concerning any withdrawal of cash of more than \$1,000 by
9 You during the Relevant Period.

10 **RESPONSE TO REQUEST NO. 20:**

11 This Request is both vague and ambiguous requiring Mr. Letcavage to speculate on
12 what "concerning" means, however, Mr. Letcavage has previously responded to this
13 Request. Without waiving these and all prior objections and after a diligent search of
14 potential sources of records, Mr. Letcavage is unaware of any additional documents that
15 exist to respond to this Request. No further documents will be provided.

16 **REQUEST NO. 21:**

17 Documents sufficient to show all parties who owe You more than \$1,000 or
18 who are holding funds in excess of \$1,000 to which You have a right or claim.

19 **RESPONSE TO REQUEST NO. 21:**

20 Mr. Letcavage has previously responded to this Request. Without waiving these and
21 all prior objections and after a diligent search of potential sources of records, Mr.
22 Letcavage is unaware of any additional documents that exist to respond to this Request.
23 No further documents will be provided.

24 **REQUEST NO. 22:**

25 Documents sufficient to show Your current net worth.

26 **RESPONSE TO REQUEST NO. 22:**

27 Mr. Letcavage objects to Request No. 22 as unduly burdensome based upon the

1 following grounds:

- 2 1. The Request seeks documents that are privileged and not subject to
3 production.
- 4 2. This Request potentially seeks voluminous records over more than a nine (9)
5 year period.
- 6 3. Mr. Letcavage objects to the over broad scope of this Request. Plaintiff seeks
7 documents spanning a period of nine (9) years. Mr. Letcavage's position is
8 that the Relevant Period should be limited to January 1, 2017 to the Present.
- 9 4. Mr. Letcavage objects to this Request as it may seek confidential third-party
10 information and Mr. Letcavage does not have authorization to disclose such
11 records that could result in exposure to liability brought by third parties for any
12 such unauthorized disclosure.
- 13 5. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
14 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
15 California State Constitution, and the Right to Privacy Act of 1978.

16 Without waiving these and all prior objections, Mr. Letcavage is having a financial
17 statement or comparable document prepared and has conveyed this information to the
18 Plaintiff. Upon completion the documents will be provided pursuant to this request. After a
19 diligent search of potential sources of records, Mr. Letcavage is unaware of any additional
20 documents that exist to respond to this Request.

21 **REQUEST NO. 23:**

22 Documents sufficient to show all of Your asset, liabilities, income and
23 expenses over \$5,000.

24 **RESPONSE TO REQUEST NO. 23:**

25 Mr. Letcavage objects to Request No. 23 as unduly burdensome based upon the
26 following grounds:

- 27 1. The Request seeks documents that are privileged and not subject to

1 production.

2 2. This Request duplicates Request 22, above, which potentially seeks
3 voluminous records over more than a nine (9) year period.

4 3. This Request potentially seeks voluminous records over more than a nine (9)
5 year period.

6 4. Mr. Letcavage objects to the over broad scope of this Request. Plaintiff seeks
7 documents spanning a period of nine (9) years. Mr. Letcavage's position is
8 that the Relevant Period should be limited to January 1, 2017 to the Present.

9 5. Lastly, Mr. Letcavage objects to this Request on the grounds that the records
10 sought are in violation of the Fourth Amendment of the U.S. Constitution, the
11 California State Constitution, and the Right to Privacy Act of 1978. Moreover,
12 Mr. Letcavage is advised by prior counsel that during a call with SEC Counsel
13 on March 9, 2021, Mr. Letcavage's counsel was told that the redaction of
14 confidential third-party financial information could be addressed with a
15 confidentiality agreement, however, no confidentiality agreement was
16 provided.

17 Without waiving these and all prior objections, As stated in Response to request 22,
18 Mr. Letcavage is having a financial statement or comparable document prepared and has
19 conveyed this information to the Plaintiff. Upon completion the documents will be provided
20 pursuant to this request. After a diligent search of potential sources of records, Mr.
21 Letcavage is unaware of any additional documents that exist to respond to this Request.

22 **REQUEST NO. 24:**

23 Documents sufficient to show each statement You have made under oath not
24 previously provided to the SEC during this litigation, about your finances, financial
25 prospects, assets, liabilities, income and expenses during the Relevant Period.

RESPONSE TO REQUEST NO. 24:

Mr. Letcavage is unaware of any statements under oath in this litigation that have not been previously provided or accessible by the SEC. Therefore there are no documents that can be produced to this request.

August 5, 2021

By: Phillip G. Trad
PHILLIP G. TRAD, ESQ.
Attorney for Randall Letcavage

I approve this filing:

By: /s/ Randall Letcavage
Randall Letcavage

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is Post Office Box 19093, Irvine California 92623.

On August 5, 2021, I served true copies of the following document(s) described as **DEFENDANT RANDALL LETCAVAGE'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S POST-JUDGMENT DOCUMENT REQUEST** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following ordinary business practices. I am readily familiar with the practice of Law Offices of Phillip G. Trad for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Anaheim, California.

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address ptrad@roadrunner.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 5, 2021, at Irvine, California.

By: /s/ Phillip G. Trad
Phillip G. Trad

MASTER SERVICE LIST
SECURITIES AND EXCHANGE COMMISSION v. PREMIER HOLDING
CORPORATION, et al.
Case No. CV 18-00813-CJC(KESx)

Bennett Ellenbogen (served by CM/ECF only)
Howard A Fischer (served by CM/ECF only) Neal Jacobson (served by CM/ECF only)
Alexander M Vasilescu (served by CM/ECF only)
US Securities and Exchange Commission
New York Regional Office 200 Vesey Street Suite 400
New York, NY 10281 212-336-0062
212-336-1322 (fax)

Amy J Longo (served by CM/ECF only)
US Securities and Exchange Commission
Los Angeles Regional Office
444 South Flower Street Suite 900
Los Angeles, CA 90071 323-965-3998
213-443-1904 (fax)
longoa@sec.gov

Attorneys for Plaintiff Securities and Exchange Commission